

From: Peter St. Clair <phstc@aol.com>
Sent: Saturday, May 14, 2016 7:55 PM
To: Vegetation Treatment Program@BOF
Subject: Comments to VTPEIR

Please accept my comments on the latest draft VTPEIR.

1. First and foremost, I cannot find justification for VTP Objective #4. It is not an objective. It is a description of the project.

An acceptable objective might have been natural resource conservation. Such goals are stated and referenced throughout the VTPEIR, but I do not think they are program objectives. They should be.

In this PEIR Vegetation Treatment (VT) is proposed as the only solution to wildfire and the only means of mitigating loss of life and property.

This is clearly not true.

Therefore, VTPEIR has not considered meaningful alternatives.

2. Section 3 is deficient.

One solution would be to significantly scale back the objectives and scope of both VTP and VTPEIR or break apart various programs that together work toward the objectives and consider each on a stand alone, or integrated basis in a new PEIR that would encompass more options.

Unless that is done, the No Project Alternative is a more realistic and effective program and is most likely to achieve our goals and objectives.

The other alternatives that are considered are at best sub-categories of the Proposed Program. Since resource conservation does not appear to be an Objective, I do not see how the Alternatives can be rejected.

3. Different alternatives might fulfill the project objectives at far lower cost and environmental impact.

One is full enforcement of PRC 4291 including structure hardening and "shelter in place" modifications to communities threatened by wildfire. Where implemented, these have proven highly effective in protecting lives and property.

Another alternative may be more applicable in Southern California. Here, something like 90% of wildfires are caused by accidental ignition. VTPEIR does not consider the alternative of widespread education and public outreach as a way of reducing such ignitions and eliminating the need for large scale VT.

4. Section 3 makes statements (eg 3.7.3 page 3-35) about the efficacy of fuel breaks and prescribed burns. While the FBE SPR's are excellent, I have not observed them actually working. In So Cal forests, hired crews cut brush and low limbs and pile them. The piles are ignited. Ground fire results, but the height and density of the piled fuels leads to burning and scorching of tree trunks and limbs. These have not regenerated, more so in pine forests than other areas. So in prescribed burns we lose a lot of healthy young trees. An officer in charge of two recent controlled burns told me, "They burned too hot and too high." No amount of FBE SPR's or PSR's can prevent this.

5. Too often VT becomes a rural jobs program and not a means to protect life and property. VT allows treatments to occur far from communities where life and property are threatened.

6. There is a troubling statement on page 3-8 concerning the No Project Alternative and "consistent application" of SPR's and mitigation measures.

Why should programs carried out in our incredibly diverse state have to be consistent? And why would any program or project be undertaken by CalFire that is unlawful or inconsistent with existing regulations? I think you are treading on thin ice when you criticize the No Project Alternative for what may be a virtue: greater compatibility with "on the ground conditions". Indeed, Section 7.1 page 7-1 suggests CalFire may use PSR's in addition to SPR's any time, any place. Your rejection of the No Project Alternative is in itself inconsistent.

This incredibly top down thinking leads to other problematic conclusions, such as those reached in Section 7 PSA Priority Ranking flowchart, Attachment B. As I read the flowchart, "maintenance" is never more highly prioritized than a "new project". This cannot be true. Indeed maintenance of prior treatments may be mandated--for example growth of annual weeds and flashy fuels on open fire breaks in Southern California.

7. Contrary to what you say on page 7-35 about "shaded fuel breaks", I don't think there are many places in chaparral where this can be achieved. Fuel breaks are more likely to resemble the photos in the VTPEIR.

8. There should be many cases where maintenance has priority in protecting lives and property as well as in conserving natural resources.

I think these problems highlight the difficulty of "checklist" style environmental and project analysis. Indeed, since VTPEIR concludes that SPR's take the place of mitigation, there needs to be far more public involvement than is planned. This includes front end involvement in project design. It includes monitoring. It includes revisions to protocols following project analysis.

Since landscapes change over long periods of time (response to fire is slow and growing slower as drought conditions increase), it is best to prioritize VT correctly and to go slow, taking into account many perspectives on past incidents and responses as well as emerging and changing perspectives on the impact of VT on resource conservation.

VT can accomplish many things, but not everything. Follow through on sheltering in place and hardening structures is perhaps the least costly and fastest way of gaining protections in the WUI.

9. Again with respect to Southern California, the only reason to undertake VT beyond defensible space boundaries would be to conserve resources. But that does not appear to be a program objective. (See Section 3 page 3-9). But it is also possible that the most effective means of

conserving resources is not Vegetation Treatment. Indeed, VT seems only a minor subset of resource conservation efforts.

10. I continue to be confused about the rejection of the few project alternatives that were actually considered. It appears their rejection is without adequate analysis. The rejections assume VT is the overarching goal and method within the State of California to manage resources and manage wildfire and its outcome. That is clearly not true.

11. Paragraph 4 Section 3.3, page 3-9 makes the statement that the most destructive wildfires are predominately in mountain areas. I do not think that is even close to the truth in Southern California. Again, there is a prejudice in the VTPEIR for large scale VT when much smaller scale management under PRC 4291 or in the WUI or in VHFHSZ may work better.

12. Moving to Appendix I, subsection I-1 seems to say "We might listen to the public, but we plan to ignore you." This is pretty insulting. So is most of the analysis on adaptive management. I 2.1 seems to dismiss third parties, including scientists and the benefits of their involvement in project design, monitoring, review and adaptation. Your sense of active adaptive management reminds me of the joy felt by administrators everywhere who revise the annual calendar year budget each month then proclaim they have "made budget" after the final revision in December. Guess what? There is no learning. In natural settings it may take a great deal of time for the ecosystem to respond to something like wildfire--or something like VT. Please give things time. Do not rush to judgment as to what is happening or not happening. Wildfire has been a major player in Western ecosystems for tens of thousands of years.

13. Again in Appendix I, why would you undertake VT in an area that excludes critical infrastructure or forest health? This idea pops up a few times in VTPEIR. This suggests the scope is virtually unlimited. Yet as important as these treatments are, you exclude the public and third party (scientists) from evaluation and approval. See I.4.2 If this is the case there should be very few projects where any notice is given. If not, the scope of VT is greater than implied. And public input is valued at close to zero.

14. I do not understand the language of BIO 6 on page I-21. What "species" is referred to? The oaks, or the wildlife that inhabit oak lands? Who is an "applicant"? This section seems to say that public lands will be managed to suit hunters. Is that an objective of VT?

Here are my comments from February, 2013. Nothing in the newly circulated draft seems to have addressed these concerns and the alternative of enforcing PRC 4291.

From: Peter St. Clair [<mailto:phstc@aol.com>]
Sent: Tuesday, February 19, 2013 6:21 PM
To: Vegetation Treatment Program@CALFIRE
Subject: VTPEIR Comment

Please accept my comments on the VTPEIR.

I served on the City of San Diego Open Space Canyons Advisory Committee.

I was a Vice President of the local chapter, California Native Plant Society.

I worked with State Senator Christine Kehoe on her revision of PRC 4291 which was signed into law and is being implemented by CalFire.

I worked with federal, state and local wildlife agency officials, planning and building officials to establish conservation banks and other lands set aside to mitigate development impacts and protect endangered species.

I served on a commission established by Gov. Pete Wilson to implement NCCP, the Natural Communities Conservation Program.

I have experience reviewing environmental documents related to large scale habitat management and wildfire.

VTPEIR project alternatives do not consider the most obvious alternative:

--Reduce fire frequency and intensity by implementing PRC4291 and requiring existing structures to be hardened against fire.

It is obvious that if more private owners were to comply with PRC4291 and local government were to mandate existing structures be hardened against fire, as they do for new structures, then a great deal of the perceived need for VTPEIR could evaporate. These treatments would be on private land and would comply with state and local guidelines for vegetation management and construction.

CalFire has taken the position that PRC4291 does not mandate structural improvements. On the face of it, that is incorrect. PRC4291 is quite clear that construction methods will change as a result of its requirements. It appears that CalFire has not wanted to get into disputes with local planning, zoning and building officials. And thus has backed off fully implementing existing law.

Implementing PRC4291 would reduce the need for vegetation treatments described in VTPEIR.

Additionally, there is insufficient scientific evidence that vegetation treatment programs such as outlined in VTPEIR provide new protections. After the San Diego Cedar and Witch Fires (2003 and 2007) insurance company investigators compared "before" photos of properties that had "cleared" vegetation with "after" photos of properties that survived wildfire and properties that were burned. It appears that some degree of native vegetative cover, including tree-form shrubs, oaks and other trees serve to knock down burning embers before they reach structures, thus reducing or eliminating fire risk. If these shrubs and trees are removed under VTPEIR, it is highly possible that structures and communities will be more vulnerable to wildfire.

Indeed, fuel breaks, improperly maintained, grow annual weeds and grasses. These die back (in Southern California) in spring and create fuel for wildfire that may not have existed absent the vegetative treatment.

And, when the San Diego fires burned from east to west, they leaped across 16 lanes of solid concrete at Interstate 15 in Mira Mesa. This is as wide and as fireproof a "fuel break" as ever existed and it was insufficient to stop Santa Ana driven wildfire.

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